

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN CHINN

Defendant.

CASE NO. 2:23 -cr- 188

CHIEF JUDGE SARAH D. MORRISON

**GOVERNMENT'S UNOPPOSED MOTION TO CONTINUE THE  
SENTENCING HEARING**

The United States, by and through undersigned counsel, hereby moves to continue the sentencing hearing set in this case scheduled for Stephen Chinn.

On August 27, 2024, the defendant, Stephen Chinn entered a guilty plea to Count two and Count Three of the Indictment in this case, which charged him in Count Two with Receipt of Child Pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1), and in Count Three with Possession of Child Pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2). The disclosure of the final Presentence Investigation Report (PSR) in this case has already occurred. (*See* ECF. No. 41 - *SEALED*). The sentencing hearing was scheduled for January 29, 2025 at 10:00am for Mr. Chinn. (*See* ECF. 42). However, counsel for the Government will be in trial before Judge Sargus and therefore, is unavailable on that date and at that time. Therefore, the Government contacted counsel for Mr. Chinn accordingly to confer on a motion to continue. Counsel for Mr. Chinn does not object to this request.

Counsel for the government is unavailable all of January 2025 and the beginning of March 2025 and counsel for Mr. Chinn is unavailable in February 2025 – all due to previously scheduled trials both in federal and state court. If the Court were to grant this motion, the new proposed

sentencing date would be sometime after March 10, 2025, depending on the Court's availability.

Respectfully Submitted,

KENNETH L. PARKER  
United States Attorney

s/Emily Czerniejewski  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Continuance for the Sentencing Hearing was served this 22<sup>nd</sup> day of December, electronically upon counsel(s) for the defendant.

s/Emily Czerniejewski  
EMILY CZERNIEJEWSKI  
Assistant United States Attorney